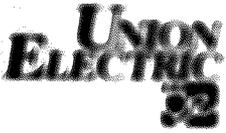


(314) 934-2332



April 24, 1991

Mr. Brent Stewart
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo. 65102

Re: Case No. EO-91-251

Dear Mr. Stewart:

Enclosed, for filing with the Commission, are the original and fourteen (14) copies of "Motion of Union Electric Company to Withdraw Application."

Please date stamp the extra copy of this letter that has been enclosed for this purpose, and return it to me in the enclosed stamped, self-addressed envelope.

Very truly yours,

Michael F. Barnes

Michael F. Barnes
Attorney

cc: Parties on Certificate of Service

FILED
APR 25 1991
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Application of Union Electric)
Company for Variance from)
Promotional Practices Rule for) Case No. EO-91-251
Good Cause Shown and for Approval)
of Promotional Practices Sheets.)

**MOTION OF UNION ELECTRIC COMPANY
TO WITHDRAW APPLICATION**

Comes now Union Electric Company (UE) and moves to withdraw its Application in this case. In support of its motion, UE states as follows:

1. On January 14, 1991, UE filed with the Commission its "Application of Union Electric Company for Variance from Promotional Practices Rule for Good Cause Shown and for Approval of Promotional Practices Sheets."

2. As UE noted in the affidavit that accompanied its Application, an important purpose of the proposed Satisfaction Guarantee program is "to offset misinformation in the marketplace which has caused an irrational fear of heat pumps."

(Affidavit, p. 3) With the withdrawal of this Application, UE is determined to pursue this goal through other means.

3. At paragraph 6.a. of its Application, UE stated:

UE would like to begin active promotion of the pilot program no later than May 1991, which corresponds with the beginning of the air conditioner/heat pump replacement period. Any later start would almost surely have a negative impact on the program's results.

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APR 25 1991

PUBLIC SERVICE COMMISSION

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4. The Commission's April 5 "Order and Notice of Hearing" set June 10, 1991, as the hearing date, which means a final order would probably not be issued until the middle or late summer of this year. This anticipated schedule will almost surely "have a negative impact on the program's results," and therefore UE moves to withdraw its Application.

WHEREFORE, for the reasons stated above, Union Electric Company respectfully moves this Commission to permit it to withdraw its Application in this case.

Respectfully submitted,

UNION ELECTRIC COMPANY

Michael F. Barnes

By Michael F. Barnes
Attorney
Union Electric Company
P.O. Box 149
St. Louis, Mo. 63166
(314) 554-2552

Dated: April 24, 1991

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served on the parties listed below, by enclosing the same in an envelope addressed to such parties at their respective addresses, with postage fully prepaid, and by depositing said envelopes in the United States mail in St. Louis, Missouri, this 24th day of April, 1991.

Michael F. Barnes
Michael F. Barnes

Mary Ann Young
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo. 65102

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